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Attorney for Defendant
PAULO PEREZ-MENDOZA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAULO PEREZ-MENDOZA,

Defendant.

Case No. 2:24-CR-00073-DC

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; FINDINGS AND
ORDER**

DATE: February 7, 2025
TIME: 9:30 a.m.
COURT: Hon. Dena M. Coggins

STIPULATION

Defendant PAULO PEREZ-MENDOZA, by and through his counsel of record, and Plaintiff, United States of America, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on February 7, 2025.
2. This matter has previously been continued on two occasions at the request of the parties, *see* Dkts. 37 & 48, to allow for defense counsel to review what is now over 20,000 pages of discovery. In the Court's last order continuing the status to February 7, 2025, the Court noted that the bases in the parties' second request was nearly identical to their first and required the parties to demonstrate good cause for any further continuance.
3. By this stipulation, Defendant now moves to continue the status conference until April 18, 2025, and to exclude time between February 7, 2025 and April 18, 2025, under Local Code

T4.

4. The parties agree and stipulate, and request that the Court find the following:

- a) The government has produced discovery associated in this case, which includes over 20,000 Bates stamped pages. The discovery also includes recordings and cell phone extractions that contain entire email accounts and bank records. Many recordings and messages are in the Spanish language and have needed to be translated.
- b) Counsel for defendant has been processing all this discovery and continues to do so, while also conducting her own independent factual and legal investigations as they relate to potential pretrial motions, trial defenses, sentencing guideline calculations, and immigration consequences.
- c) In connection with those investigations, defense counsel has also communicated a supplemental discovery request to the government.
- d) Defense counsel maintains that additional time is necessary to conduct her investigations, receive and review potential supplemental discovery, and to properly advise her client.
- e) Counsel for defendant believes that the failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
- f) The government does not object to the continuance.
- g) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 7, 2025, to April 18, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a

speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Dated: January 30, 2025

/s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
PAULO PEREZ-MENDOZA


Dated: January 30, 2025

/s/ Karen Escobar
KAREN ESCOBAR
Assistant United States Attorney

ORDER

IT IS SO ORDERED.

Dated: January 31, 2025


Dena Coggins
United States District Judge